

**IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

Zane Dickens,

Plaintiff,

vs.

Orville Winston Barton and
Winston Trucking, LLC,

Defendants.

Case No.: 9:24-cv-06005-DCN

**PLAINTIFF'S RULE 26(A)(2) EXPERT
WITNESS DISCLOSURES**

Plaintiff Zane Dickens hereby submits his expert disclosure as required by Federal Rule of Civil Procedure 26(a)(2) and the Court's Case Management and Scheduling Order. Plaintiff has not retained any expert witnesses pursuant to Rule 26(a)(2)(B) at this time.

Plaintiff reserves the right to call his treatment providers as witnesses. Plaintiff anticipates that his treatment providers will qualify as experts by knowledge, skill, experience, training, or education, and Plaintiff reserves the right to elicit testimony regarding each provider's opinions, if any, regarding the cause, diagnosis, treatment, and prognosis of Plaintiff's injuries. Plaintiff's treating providers who may be called testify at trial and are known at this time are as follows:

1. Sean M. Mahan, MD

Dr. Mahan is a board-certified radiologist who has read the magnetic resonance imaging of Plaintiff's cervical spine. Dr. Mahan is expected to testify regarding his opinions of the imaging consistent with Dr. Mahan's medical records.

2. Benjamin H. Foster, MD

Dr. Foster is an ER doctor who provided treatment for Plaintiff's injuries immediately following this crash. Dr. Foster is expected to testify regarding the nature and cause of Plaintiff's injuries, as well as his treatment of Plaintiff's injuries and his recommendations for future care, consistent with Dr. Foster's medical records.

3. Dan Martin, MD

Dr. Martin is a board-certified pain medicine physician who has provided treatment for Plaintiff's cervical spine injury following this crash. Dr. Martin is expected to testify regarding his treatment of Plaintiff's cervical injury, his opinions regarding the causation of Plaintiff's cervical injury, and his recommendations for future care, consistent with Dr. Martin's medical records.

4. Ramon Espinal, MD

Dr. Espinal is a pain medicine physician who has provided treatment for Plaintiff's cervical spine injury following this crash. Dr. Espinal is expected to testify regarding his treatment of Plaintiff's cervical injury, his opinions regarding the causation of Plaintiff's cervical injury, and his recommendations for future care, consistent with Dr. Espinal's medical records.

5. Daniel Colón-Conde, MD

Dr. Colón-Conde is a pain medicine physician who has provided treatment for Plaintiff's cervical spine injury following this crash. Dr. Colón-Conde is expected to testify regarding his treatment of Plaintiff's cervical injury, his opinions regarding the causation of Plaintiff's cervical injury, and his recommendations for future care, consistent with Dr. Colón-Conde's medical records.

6. Venu M Madhipatla, MD

Dr. Madhipatla is a triple board-certified physician in Anesthesia, Pain Management, and Critical Care who has provided treatment for Plaintiff's cervical spine injury following this crash. Dr. Madhipatla is expected to testify regarding his treatment of Plaintiff's cervical injury, his opinions regarding the causation of Plaintiff's cervical injury, and his recommendations for future care, consistent with Dr. Madhipatla's medical records.

Because Plaintiff's medical care is ongoing, Plaintiff reserves the right to supplement his list of treatment providers and to call any treatment provider as a witness at the trial of this case. Plaintiff also reserves the right to supplement this disclosure later should the case develop in such a way to warrant additional expert testimony on Plaintiff's behalf. Plaintiff further reserves the

right to elicit expert testimony from individuals named as experts by other parties, as well as other witnesses later identified who may qualify as experts under the Rules of Evidence.

MORGAN & MORGAN, P.A.

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